IN WITNESS WHEREOF, the undersigned have caused this Settlement Agreement to be executed as of the dates set forth below:

FOR THE FREY DEFENDANTS:

James Frey

Date: 1/2/07

James Frey
Big Jim Industries, Inc.

Date: 1/2/07

Maya Frey

Date: 1/2/07

Derek J. Meyer
McDermott Will & Emery LLP
227 West Monroe Street, Suite 4400
Chicago, Illinois 60606
Attorney for the Frey Defendants

Date: 1/2/07

FOR THE RANDOM HOUSE DEFENDANTS:

Robert Sorrentino
Senior Vice President, Taxes, Random House, Inc.

Date:______________

Robert Sorrentino
President, Doubleday & Company, Inc.

Date:______________

Robert Sorrentino
Vice President, Taxes, Random House VG, Inc.

Date:______________

Mark B. Blocker
Sidley Austin LLP
One South Dearborn
Chicago, Illinois 60603
Attorney for the Random House Defendants

Date:______________

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IN WITNESS WHEREOF, the undersigned have caused this Settlement Agreement to be executed as of the dates set forth below:

FOR THE FREY DEFENDANTS:	**FOR THE RANDOM HOUSE DEFENDANTS:**
____________________ James Frey	____________________ Robert Sorrentino Senior Vice President, Taxes, Random House, Inc.
Date:__________	Date: 12/15/06
____________________ James Frey Big Jim Industries, Inc.	____________________ Robert Sorrentino President, Doubleday & Company, Inc.
Date:__________	Date: 12/15/06
____________________ Maya Frey	____________________ Robert Sorrentino Vice President, Taxes, Random House VG, Inc.
Date:__________	Date: 12/15/06
____________________ Derek J. Meyer McDermott Will & Emery LLP 227 West Monroe Street, Suite 4400 Chicago, Illinois 60606 *Attorney for the Frey Defendants*	____________________ Mark B. Blocker Sidley Austin LLP One South Dearborn Chicago, Illinois 60603 *Attorney for the Random House Defendants*
Date:__________	Date: 12/28/2006

FOR THE PLAINTIFFS:

Plaintiff Marcia Vedral

Date: 12/6/06

Larry D. Drury
Larry D. Drury Ltd.
205 W. Randolph Street, Suite 1430
Chicago, Illinois 60606
Proposed Co-Lead Class Counsel
Attorney for Plaintiff Marcia Vedral

Date: 12-6-06

Plaintiff Michele Snow

Date: 12-6-06

Evan J. Smith, Esquire
Brodsky & Smith, LLC
Two Bala Plaza, Suite 602
Bala Cynwyd, PA 19004
(610) 667-6200
Proposed Co- Lead Class Counsel
Attorney for Plaintiff Michele Snow

Date: 12-6-06

Plaintiff Jennifer Cohn

Date:

Plaintiff Ann Marie Strack

Date:

Thomas Mullaney
708 Third Avenue, Suite 2500
New York, New York 10017
Phone: (212) 223-0800
Liaison Class Counsel
Attorneys for Plaintiff Jennifer Cohn

Date:

Thomas A. Zimmerman, Jr.
Zimmerman and Associates, P.C.
100 West Monroe Street, Suite 1300
Chicago, Illinois 60603
Attorney or Plaintiff Ann Marie Struck

Date:

FOR THE PLAINTIFFS:

______________________ Plaintiff Marcia Vedral	______________________ Plaintiff Michele Snow
Date:__________	Date:__________
______________________ Larry D. Drury Larry D. Drury Ltd. 205 W. Randolph Street, Suite 1430 Chicago, Illinois 60606 *Proposed Co-Lead Class Counsel* *Attorney for Plaintiff Marcia Vedral*	______________________ Evan J. Smith, Esquire Brodsky & Smith, LLC Two Bala Plaza, Suite 602 Bala Cynwyd, PA 19004 (610) 667-6200 *Proposed Co- Lead Class Counsel* *Attorney for Plaintiff Michele Snow*
Date:__________	Date:__________
Diane Marolda Plaintiff Diane Marolda	______________________ Plaintiff Ann Marie Strack
Date: 12/7/06	Date:__________
______________________ Thomas Mullaney 708 Third Avenue, Suite 2500 New York, New York 10017 Phone: (212) 223-0800 *Liaison Class Counsel* *Attorneys for Plaintiff Diane Marolda*	______________________ Thomas A. Zimmerman, Jr. Zimmerman and Associates, P.C. 100 West Monroe Street, Suite 1300 Chicago, Illinois 60603 *Attorney or Plaintiff Ann Marie Strack*
Date: 12.5.2006	Date:__________

FOR THE PLAINTIFFS:

____
Plaintiff Marcia Vedral

Date:______________

____
Plaintiff Michele Snow

Date:______________

____
Larry D. Drury
Larry D. Drury Ltd.
205 W. Randolph Street, Suite 1430
Chicago, Illinois 60606
Proposed Co-Lead Class Counsel
Attorney for Plaintiff Marcia Vedral

Date:______________

____
Evan J. Smith, Esquire
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Two Bala Plaza, Suite 602
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(610) 667-6200
Proposed Co- Lead Class Counsel
Attorney for Plaintiff Michele Snow

Date:______________

____
Plaintiff Jennifer Cohn

Date:______________

____
Plaintiff Ann Marie Strack

Date: 12-8-06

____
Thomas Mullaney
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New York, New York 10017
Phone: (212) 223-0800
Liaison Class Counsel
Attorneys for Plaintiff Jennifer Cohn

Date:______________

____
Thomas A. Zimmerman, Jr.
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100 West Monroe Street, Suite 1300
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Attorney or Plaintiff Ann Marie Strack

Date: 12-11-2006

Jimmy Floyd

Plaintiff Jimmy Floyd

Date: 1/4/07

Alan S. Ripka

Alan S. Ripka
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115 Broadway
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Attorney for Plaintiff Jimmy Floyd

Date: December 5, 2006

Plaintiff Jill Giles

Date:________________

Alan J. Statman
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255 East Fifth Street
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Date:________________

Plaintiff Pilar More

Date:________________

Thomas E. Pakenas
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Attorneys for Plaintiff Pilar More

Date:________________

Plaintiff Shera Paglinawan

Date:________________

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Date:________________

Plaintiff Sara Brackenrich

Date:________________

Vincent L. DiTommaso
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Date:________________

Plaintiff Jimmy Floyd

Date:________________

Alan S. Ripka
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Date: 11/29/06

Plaintiff Pilar More

Date: 11/29/06

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Date:________________

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Date:________________

Plaintiff Jill Giles

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Attorneys for Plaintiff Jill Giles

Date:________________

Plaintiff Shera Paglinawan

Date:________________

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Date:________________

Plaintiff Jimmy Floyd

Date:_______________

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Date:_______________

Plaintiff Pilar More

Date:_______________

Thomas E. Pakenas
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Attorneys for Plaintiff Pilar More

Date:_______________

Plaintiff Sara Brackenrich

Date: 20 Nov. 06

Vincent E. DiTommaso
DiTommaso & Lubin, PC

Plaintiff Jill Giles

Date:_______________

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Attorneys for Plaintiff Jill Giles

Date:_______________

Plaintiff Shera Paglinawan

Date:_______________

Plaintiff Wendy Shaw

Date:_______________

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Attorney for Plaintiff Shera Paglinawan

Date:_______________

Plaintiff Jimmy Floyd

Date:_______________

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Attorney for Plaintiff Jimmy Floyd

Date:_______________

Jill Giles /by her attorney CMH Atty

Plaintiff Jill Giles

Date: 12-7-06

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Attorneys for Plaintiff Jill Giles

Date: 12-7-06

Plaintiff Pilar More

Date:_______________

Thomas E. Pakenas
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Date:_______________

Plaintiff Shera Paglinawan

Date:_______________

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Date:_______________

Plaintiff Sara Brackenrich

Date:_______________

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Date:_______________

Plaintiff Jimmy Floyd

Date:______________

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Date:______________

Plaintiff Pilar More

Date:______________

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Date:______________

Plaintiff Sara Brackenrich

Date:______________

Vincent L. DiTommaso
DiTommaso & Lubin, PC

Plaintiff Jill Giles

Date:______________

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Date:______________

Plaintiff Shera Paglinawan

Date: 3 Dec. 2006

Plaintiff Wendy Shaw

Date:______________

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Attorney for Plaintiff Shera Paglinawan

Date: 12 · 3 · 2006

Plaintiff Jimmy Floyd

Date:________________

Alan S. Ripka
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Date:________________

Plaintiff Pilar More

Date:________________

Thomas E. Pakenas
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Chicago, Illinois 60661
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Date:________________

Plaintiff Sara Brackenrich

Date:________________

Vincent L. DiTommaso
DiTommaso & Lubin, PC

Plaintiff Jill Giles

Date:________________

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Attorneys for Plaintiff Jill Giles

Date:________________

Plaintiff Shera Paglinawan

Date:________________

[signature]
Plaintiff Wendy Shaw

Date: 12/2/06

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Attorney for Plaintiff Shera Paglinawan

Date:________________